

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

GREETING CARD ASSOCIATION INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS WHITEMAN (I)

Pursuant to Order No. 5875 and 39 CFR sec. 3020.116, the Greeting Card Association (GCA) submits interrogatories and/or requests for documents, as follows:

GCA/USPS-T-2/1 to 3

The term “documents” includes (without limitation) letters, memoranda, telegrams, reports, studies, articles from periodicals, speeches, testimonies, books and extracts from books, pamphlets, tabulations, and work papers. In terms of format, “documents” includes written or printed records and disks, tapes, portable drives, or other recorded media, together with such written or printed material as is necessary to understand and use such disks, tapes, drives or other recorded media.

Any part of these interrogatories may be re-directed to one or more other witness(es), or answered institutionally, as necessary.

May 14, 2021

Respectfully submitted,

GREETING CARD ASSOCIATION

David F. Stover
2970 S. Columbus St., No. B1
Arlington, VA 22206-1450
(703) 998-2568 or (703) 395-1765
E-mail: postamp02@gmail.com

GCA/USPS-T-2/1

1. In footnote 2 on page 5 of your prefiled testimony, you state that the Commission's density-related additional rate authority "is designed to be conservative, rather than providing a complete adjustment in all cases."

(a) Please explain fully what is meant by the statement that the density-related additional rate authority "is designed to be conservative."

(b) Please explain fully what is meant by "complete adjustment."

(c) Please explain fully what states of affairs are included in the phrase "in all cases."

2. Please refer to pages 8-9 of your prefiled testimony, where you explain that there will be no immediate change in the network connecting Network Distribution Centers (NDCs) because the mail primarily using this network is not affected by the instant service standard changes.

(a) Please confirm that the products which you refer to as using the NDC network are identical with the class of all products other than First-Class Mail and end-to-end Periodicals. If you do not confirm, please provide a correct identification of the products you refer to as using the NDC network.

(b) Did you, or, to your knowledge, anyone within the Postal Service or among its consultants, investigate whether savings in the NDC network could be achieved by changing the service standards for some or all of the mail using that network? If your answer is affirmative, please fully explain that investigation and its results, if any. If your answer is negative, please provide your understanding of why no such investigation was undertaken.

3. Please confirm that, according to the FY 2020 *Public Cost Segments and Components* report, at Cost Segment 14,

(a) Total market-dominant purchased highway transportation cost, net of that cost for First-Class Mail, was \$1,301,131 (000) minus \$602,989 (000) = \$698,142 (000).

(b) Total competitive purchased highway transportation cost was \$1,658,184 (000).

If in either case you do not confirm, please provide the correct value and explain the necessary correction.